

# **EXHIBIT “I”**

August 31, 2024

New Way Machine Components, Inc.

50 McDonald Boulevard  
Aston, PA 19014-3202 USA

Attention: Andrew J. Devitt

MATTER: 7062-a

INVOICE: 1477

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-03-24	Conference with RWS re: strategic Plan options	0.90	585.00	AJK
May-13-24	Conference with RWS re: Plan options	0.60	390.00	AJK
May-22-24	Review email from Greg Harris re: draft Liquidation Analysis for Plan	0.20	130.00	AJK
	Telephone conference with Greg Harris re: Liquidation Analysis for Plan / Third & Fourth Quarters 2024 Budget	0.90	585.00	AJK
	Review of draft Cash Flow Projections	0.30	195.00	AJK
	Telephone conference with Greg Harris re: projections for Plan of Reorganization	0.90	585.00	AJK
May-23-24	Meeting with Jared Schaffstall, Drew Devitt & Greg Harris re: outline of Reorganization Plan	1.40	910.00	AJK
	Telephone conference with Greg Harris re: Plan of Reorganization / Settlement Discussions	0.20	130.00	AJK
May-24-24	Draft & review definition section to Plan of Reorganization	2.30	1,495.00	AJK
May-28-24	Draft & review Plan of Reorganization	6.10	3,965.00	AJK
May-29-24	Draft & review Plan of Reorganization	3.50	2,275.00	AJK
May-30-24	Draft & review revised Treatment of PNC Bank Secured Claim under Plan	0.90	585.00	AJK
Jun-11-24	Zoom call with Greg Harris, Drew Devitt,	1.10	715.00	AJK

	Jared Schaffstall & RWS (partial call) re: Plan, Projections & PNC - Cash Collateral			
Jun-14-24	Telephone conference with Greg Harris re: Plan Alternatives	0.40	260.00	AJK
	Conference with RWS re: Plan Alternatives	0.50	325.00	AJK
	Review email from Greg Harris re: Liquidation Analysis	0.50	325.00	AJK
	Telephone conference with Greg Harris re: Liquidation Analysis	0.60	390.00	AJK
Jun-17-24	Zoom call with Greg Harris re: Projections for Plan	1.50	975.00	AJK
Jun-18-24	Draft, review & analyze revisions to Plan of Reorganization	4.10	2,665.00	AJK
Jun-19-24	Review of ERS research re: disposable income / Subchapter V Plan	2.10	1,365.00	AJK
	Draft, review & analyze Plan of Reorganization	3.90	2,535.00	AJK
Jun-20-24	Review email from Greg Harris re: Liquidation Analysis	0.90	585.00	AJK
	Draft, review & analyze Plan of Reorganization	3.70	2,405.00	AJK
Jun-21-24	Review email from Greg Harris re: revised Liquidation Analysis	0.70	455.00	AJK
	Draft & review revisions to Plan of Reorganization	1.90	1,235.00	AJK
Jun-23-24	Draft, review & analyze Plan of Reorganization	6.10	3,965.00	AJK
Jun-25-24	Telephone conference with Greg Harris re: operations / Plan Projections	0.90	585.00	AJK
	Draft & review email to Drew Devitt re: Plan / Adversary Complaint	0.10	65.00	AJK
	Draft & review outline of Motion for Entry of Order Scheduling Confirmation Hearing & deadlines related thereto	0.90	585.00	AJK

Jun-26-24	Telephone conference with Greg Harris re: Plan Projections	0.60	390.00	AJK
	Draft & review Motion to Approve Solicitation Procedures Order & related Notices	2.50	1,625.00	AJK
	Draft & review revisions to Plan of Reorganization	2.10	1,365.00	AJK
Jun-27-24	Review email from Greg Harris re: Plan Projections	0.60	390.00	AJK
	Telephone conference with Greg Harris & Mike Reich re: Plan Projections	0.60	390.00	AJK
	Draft & review summary of Plan payments by Classes & unidentified Claims & alternative option for Nick Hackett Claim	1.10	715.00	AJK
	Review & revise draft Plan dated 6/27/24	1.40	910.00	AJK
Jun-28-24	Review email from Drew Devitt re: Plan	0.10	65.00	AJK
	Review email from Jared Schaffstall re: Plan	0.10	65.00	AJK
Jul-02-24	Zoom Meeting with Greg Harris, Jared Schaffstall & Drew Devitt re: PNC Bank / Plan	2.00	1,300.00	AJK
	Review email from Greg Harris re: revised Projections	0.70	455.00	AJK
	Telephone conference with Greg Harris re: revised Projections	1.30	845.00	AJK
	Review & revise Plan of Reorganization	2.50	1,625.00	AJK
Jul-03-24	Review email from Mike Reich re: PNC Bank purchase card in Budget updated	0.10	65.00	AJK
	Draft & review revisions to Plan	3.50	2,275.00	AJK
	Review of revised Liquidation Analysis	0.50	325.00	AJK
	Draft & review email to Greg Harris & reply re: updated Plan Projections	0.30	195.00	AJK
Jul-05-24	Review email from Greg Harris & reply re: revised Projections for Plan	0.50	325.00	AJK

	Zoom call with Greg Harris re: comments & revisions to revised Projections for Plan	1.10	715.00	AJK
Jul-08-24	Review of research re: cram down interest rates	2.50	1,625.00	AJK
Jul-10-24	Draft & review revisions to Plan	3.40	2,210.00	AJK
	Draft & review email to Greg Harris & reply re: Financial Projections for Plan	0.20	130.00	AJK
Jul-11-24	Draft & review revisions to Plan	1.80	1,170.00	AJK
Jul-12-24	Draft & review revision to Plan	3.50	2,275.00	AJK
Jul-13-24	Research re: Subchapter V Plans	4.50	2,925.00	AJK
Jul-14-24	Draft & review Plan of Reorganization	7.50	4,875.00	AJK
Jul-15-24	Review email from Greg Harris re: comments to ¶ 2.6, 2.7.1 & 2.7.2	0.50	325.00	AJK
	Zoom meeting with Greg Harris, Mike Reich & RMG re: revised Plan & Exhibits	1.80	1,170.00	AJK
	Draft & review revisions to Plan	2.50	1,625.00	AJK
	Review of ERS research re: UST Objection to Subchapter V Plans	2.10	1,365.00	AJK
	Review of revised financials prepared by Greg Harris	0.90	585.00	AJK
	Telephone conference with Greg Harris, Mike Reich & RMG re: revised Projections	0.70	455.00	AJK
	Review email from Greg Harris re: Liquidation Analysis & Projections	0.20	130.00	AJK
Jul-16-24	Review email from Greg Harris with attached revised Projections for Plan	0.90	585.00	AJK
	Telephone conference with Greg Harris, Mike Reich & RMG re: comments to revised Projections & Exhibits to Plan - Settlement with Hackett	0.70	455.00	AJK
Jul-17-24	Telephone conference with Jared Schaffstall re: draft Plan	0.20	130.00	AJK

	Telephone conference with Drew Devitt re: draft Plan	0.30	195.00	AJK
	Review email from Jared Schaffstall re: comments to draft Plan	0.20	130.00	AJK
	Review email from Holly Miller & reply re: draft Plan	0.20	130.00	AJK
	Review Exhibit H to Plan re: Schedule	0.10	65.00	AJK
	Review email from Greg Harris re: financial information for blanks in draft Plan	0.10	65.00	AJK
	Draft & review email to Drew Devitt & Jared Schaffstall & reply re: revised Plan	0.20	130.00	AJK
Jul-18-24	Review email from Larry Kotler re: revisions to revised draft Plan	0.30	195.00	AJK
	Review of revised Motion to Approve Solicitation Procedures / Ballots	1.10	715.00	AJK
	Review email from Larry Kotler re: request for Exhibit G to Plan	0.10	65.00	AJK
	Review of draft Exhibit G & markup comments	0.30	195.00	AJK
	Telephone conference with Greg Harris re: revisions to Exhibit G to Plan	0.10	65.00	AJK
	Review email from Greg Harris re: revised Exhibit G	0.10	65.00	AJK
	Draft & review email to Larry Kotler & Holly Miller re: Exhibit G to Plan	0.10	65.00	AJK
	Review of revised Plan with populated Table of Contents & additional nits for filing	0.90	585.00	AJK
	Email to Greg Harris, Jared Schaffstall & Drew Devitt re: filed Plan, 9019 Motion & Motion to Approve Solicitation Procedures	0.20	130.00	AJK
	Telephone conference with Greg Harris re: Plan & Exhibit I & J	0.40	260.00	AJK
	Email to Jared Schaffstall & Drew Devitt re: further revised Plan / blacklined Plan	0.10	65.00	AJK

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May-22-24	Review email from Greg Harris re: draft Liquidation Analysis for Plan	0.20	130.00	AJK
	Telephone conference with Greg Harris re: Liquidation Analysis for Plan / Third & Fourth Quarters 2024 Budget	0.90	585.00	AJK
	Review of draft Cash Flow Projections	0.30	195.00	AJK
	Telephone conference with Greg Harris re: projections for Plan of Reorganization	0.90	585.00	AJK
May-23-24	Meeting with Jared Schaffstall, Drew Devitt & Greg Harris re: outline of Reorganization Plan	1.40	910.00	AJK
	Telephone conference with Greg Harris re: Plan of Reorganization / Settlement Discussions	0.20	130.00	AJK
May-24-24	Draft & review definition section to Plan of Reorganization	2.30	1,495.00	AJK
May-28-24	Draft & review Plan of Reorganization	6.10	3,965.00	AJK
May-29-24	Draft & review Plan of Reorganization	3.50	2,275.00	AJK
May-30-24	Draft & review revised Treatment of PNC Bank Secured Claim under Plan	0.90	585.00	AJK
Jun-11-24	Zoom call with Greg Harris, Drew Devitt,	1.10	715.00	AJK

	Draft & review email to Greg Harris re: additional revisions to Financial Projections	0.30	195.00	AJK
	Review email from Greg Harris re: further revised Financial Projections & Liquidation Analysis	0.40	260.00	AJK
	Draft & review email to Greg Harris re: additional revisions to Liquidation Analysis	0.20	130.00	AJK
Aug-07-24	Review of (filing version) Exhibit I (Final Projections) & Exhibit J (Liquidation Analysis) to Plan	0.20	130.00	AJK
	Review email from Kacie Cartwright re: Plan	0.20	130.00	AJK
	Review of Plan re: UST questions	0.30	195.00	AJK
	Draft & review email to Kacie Cartwright re: Plan	0.20	130.00	AJK
Aug-09-24	Review email from Jen Maleski re: PNC Bank / Plan	0.50	325.00	AJK
	Zoom call with Drew Devitt & Jared Schaffstall re: PNC comments to Plan	1.00	650.00	AJK
Aug-14-24	Draft & review proposed dates for Solicitation Procedures re: Confirmation of Plan	0.70	455.00	AJK
Aug-15-24	Research re: treatment of Subchapter V classes that do not vote	0.90	585.00	AJK
	Draft & review revisions to Solicitation Procedures Order	0.70	455.00	AJK
	Review & revise Exhibits to Solicitation Procedures Order	1.50	975.00	AJK
Aug-19-24	Review proposed Dates for Solicitation Procedures Order	0.50	325.00	AJK
	Review email from Holly Miller re: Solicitation Procedures	0.10	65.00	AJK
	Draft & review email to Holly Miller & Larry Kotler re: Solicitation Procedures	0.20	130.00	AJK
	Draft & review email to Kacie Cartwright re: Solicitation Procedures	0.10	65.00	AJK



	Review email from Jen Maleski re: proposed Solicitation Procedures Dates & Certification of Counsel are acceptable to PNC	0.10	65.00	AJK
	Review email from Holly Miller re: proposed dates & Solicitation Procedures Order acceptable	0.10	65.00	AJK
	Review email from Larry Kotler re: proposed dates & Solicitation Procedures Order acceptable	0.10	65.00	AJK
	Research re: Honorable Paul Bonepfel article on Subchapter V is good for creditors	0.70	455.00	AJK
Aug-20-24	Review of revised Solicitation Procedures Order & Exhibits 1, 2, 2-1, 2-2, 2-3, 3, 4, 5 & 6	1.20	780.00	AJK
	Review of Service List for Solicitation Packages	0.40	260.00	AJK
	Second call with Jared Schaffstall re: Solicitation Packages	0.30	195.00	AJK
	Review email from Kacie Cartwright & reply re: proposed dated for Solicitation Procedures	0.10	65.00	AJK
	Review email from Kacie Cartwright & reply re: UST ok with Certification of Counsel & Approval Order re: Hackett Settlement	0.10	65.00	AJK
Aug-21-24	Court Appearance re: Solicitation Procedures / 9019 Motion - Hackett Settlement	0.80	520.00	AJK
	Review Order Scheduling Hearing on Confirmation of Plan & Related Relief	0.10	65.00	AJK
Aug-22-24	Draft & review email to Drew Devitt, Jared Schaffstall & Greg Harris re: Confirmation Hearing	0.20	130.00	AJK
	Review email from Drew Devitt re: Confirmation Hearing	0.10	65.00	AJK
	Review email from Jared Schaffstall re: Confirmation Hearing	0.10	65.00	AJK
	Review email from Greg Harris re: Confirmation Hearing	0.10	65.00	AJK

	Review of Solicitation version of Plan of Reorganization	0.90	585.00	AJK
	Review of Solicitation version of Ballots: Class 2, Class 3 & Class 5	0.30	195.00	AJK
	Review of Solicitation version of Confirmation Hearing Notice, Non-Voting Status Notice, Plan Supplement Notices & cover letter	0.70	455.00	AJK
	Review of Plan & PNC issues with Treatment re: Settlement Proposal	1.50	975.00	AJK
Aug-23-24	Review of Solicitation version of Plan with all Exhibits for filing	0.90	585.00	AJK
	Telephone conference with Joel Shapiro re: Plan	0.20	130.00	AJK
	Review of Solicitation version of Motion of Confirmation Hearing	0.30	195.00	AJK
	Review of Solicitation Procedures for filing with Court	0.30	195.00	AJK
Aug-26-24	Review of Non-Voting packages for dissemination to Non-Voting Parties	0.30	195.00	AJK
	Review of Notice only to PA L&I re: Notice of Hearing to Consider Confirmation of Plan	0.10	65.00	AJK
	Review Notice to 2002 Parties re: Solicitation Procedures Order, Solicitation version of Plan, Confirmation Hearing Notice & Solicitation Procedures	0.30	195.00	AJK
Apr-28-24	Research case law analyzing 11 USC 1191(d)(2) re: disposable income	1.50	450.00	ERS
Apr-29-24	Research re: case law analyzing disposable income under 1191(d)(2)	3.20	960.00	ERS
Apr-30-24	Draft & review Memo on Subchapter V Filings & §1191(d)(2) & 1111(b)	1.60	480.00	ERS
May-01-24	Research re: case law on 1129(b)(2) in Subchapter V context	1.90	570.00	ERS
	Research re: 11 USC 1191(d)(2) case law analyzing disposable income	2.30	690.00	ERS

	Research re: Subchapter V case law reviewing plan payments & priority of distributions re: 11 USC 1191(d)(2)	1.00	300.00	ERS
	Draft & review Memo on 1191(d)(2) & 506 re: Debtor's Subchapter V filing	1.90	570.00	ERS
May-02-24	Research re: case law analyzing 11 USC 506 re: Subchapter V debtors	2.60	780.00	ERS
	Draft & review Memo on 1191(d) & 506 re: debtors status as an unsecured creditor	1.40	420.00	ERS
	Research re: Journal articles related to analyzing a debtors projected disposable income in a Subchapter V filing	1.50	450.00	ERS
May-03-24	Research re: case law brief filing in Pacer re: Subchapter V & 11 USC 1191(d)(2) standard	1.00	300.00	ERS
	Research re: Subchapter V case law outlining disposable income test for a corporate debtor under 1191(d)(2)	3.00	900.00	ERS
	Research re: statutory provisions related to plan modifications under Chapters 10, 13 & Subchapter V	2.10	630.00	ERS
May-21-24	Research case law re: "deemed acceptance" for unsecured creditors	1.60	480.00	ERS
	Research case law re: extension to file Subchapter V	1.50	450.00	ERS
May-22-24	Review of Subchapter V Plan as filed by Debtor in In Re Creason re: unsecured claims	1.40	420.00	ERS
	Review & compare Amended Subchapter V Plan to original Plan as filed by Debtor in In Re Creason	1.50	450.00	ERS
May-23-24	Pacer research: docket related to Subchapter V case filing in Western District of Michigan	0.30	90.00	ERS
	Research re: payment on principle to under secured creditors claims re: 1129(b)(2)(a) for fair & equitable treatment	2.30	690.00	ERS
	Research re: Subchapter V case law re: objections to claim amount re: unsecured creditors	3.60	1,080.00	ERS

Jun-03-24	Review email from AJK & attachments re: Memorandum / filings from In Re Vyra Pharma, Subchapter V case	1.10	330.00	ERS
	Research re: DE Subchapter V case law on corporate Subchapter V filings / Memorandums	2.30	690.00	ERS
	Research re: Subchapter V case law / Memorandum In Support of Confirmation	2.40	720.00	ERS
Jun-04-24	Research re: Delaware Subchapter V corporate debtor filings re: Memorandum In Support of Confirmation	2.30	690.00	ERS
	Research re: Subchapter V cases involving a corporate debtor, Delaware	0.90	270.00	ERS
Jun-05-24	Research re: Subchapter V corporate filing case law in Delaware Bankruptcy Court	1.10	330.00	ERS
Jun-18-24	Research Subchapter V Plan for In Re Lunya case filed in Delaware District Court	0.50	150.00	ERS
	Research DE Subchapter V filing re: Plans of Reorganization	1.00	300.00	ERS
	Reorganize client folder to create a Subchapter V Plan section with corresponding Memorandums In Support of Reorganization	0.80	240.00	ERS
	Review of previous saved Subchapter V Plans for references to financial projections	1.80	540.00	ERS
Jun-19-24	Research re: exhibits re: liquidation analysis for In Re Lunya	0.30	90.00	ERS
Jun-20-24	Research re: Motion for Approval related to Subchapter V Plans	1.80	540.00	ERS
	Research case law re: 1186 for reinvesting property back into debtor estate	3.40	1,020.00	ERS
Jun-21-24	Research re: law articles analyzing 1186 for property of estate	1.80	540.00	ERS
	Research re: case law analyzing 11 USC 1141(b) re: property vesting to a debtor	2.20	660.00	ERS
Jun-24-24	Research re: Subchapter V Plans for inclusion	2.30	690.00	ERS

	of principal/interest payments under disposable income 11 USC 1191(D)(2)			
Jun-25-24	Research case law re: disposable income payments including secured creditor distributions	3.60	1,080.00	ERS
	Research case law re: secured creditor objection to unsecured claims receiving more than their projected disposable income	2.80	840.00	ERS
	Research: review of case law re: unsecured Subchapter V creditors for Plan payment period	2.00	600.00	ERS
Jun-26-24	Research re: case law on 1191(c)(2) re: potential objection from a secured creditor	2.90	870.00	ERS
	Research re: objections by creditors related to 11 USC 1129 regarding secured creditor payment	1.00	300.00	ERS
	Research re: case law on unsecured creditor objections under 11 USC 1191(c)(2)(b) for payment period	2.50	750.00	ERS
	Draft & review Memorandum on 1191(c)(2)(b) & 11 USC 1129 re: potential objections to Subchapter V Plan	0.50	150.00	ERS
Jun-27-24	Research re: case law on 11 USC 1191(c)(2)(b) re: potential Hackett objection for lack of "fair & equitable"	1.90	570.00	ERS
	Draft & review Memo outlining Potential PNC & Hackett Objections / Responses	2.30	690.00	ERS
Jul-08-24	Review of legal articles related to usage of treasury bill percent as basis of a plan interest rate for payments to secured creditors	0.50	150.00	ERS
	Review of previous memos outlining the use of interest rates based on prime rate percentage	2.00	600.00	ERS
	Research case law re: interest rate calculations for a cram down of a Chapter 11 case	2.10	630.00	ERS
	Research re: Third Circuit case law analyzing the use of treasury bills for a Chapter 11 Plan interest rate for secured creditors	1.90	570.00	ERS
	Research case law re: "risk adjustment"	2.00	600.00	ERS

	percentage increases for a Plan interest rate calculation under Subchapter V			
Jul-09-24	Research re: Chapter 11 case law on "present value" under 1129 & applicable interest rate used for secured creditors	2.70	810.00	ERS
	Research re: Chapter 11 case law analyzing interest rates for secured creditors under 11 USC 1129	2.50	750.00	ERS
	Research re: case law analyzing rich adjustment enhancement for interest rate under 11 USC 1129	2.40	720.00	ERS
	Research re: Bankruptcy Court standing Orders re: interest rate under 11 USC 1129	0.70	210.00	ERS
Jul-10-24	Research re: prime rate historical trends re: applicable interest rates for distribution to secured creditors	1.30	390.00	ERS
	Research case law analyzing the use of prime rate as interest rate payment for secured creditors	1.50	450.00	ERS
Jul-11-24	Research re: BISBY Chart outlining historical interest rate	0.30	90.00	ERS
	Research re: SOFR Chart re: historical interest rate	0.30	90.00	ERS
	Research re: T-Bill Chart re: 5-year Treasury Rate	0.40	120.00	ERS
	Research re: T-Bill Chart re: historical rate for 2-year Treasury Notes	0.20	60.00	ERS
	Research re: Subchapter V Plan re: interest rate provisions for secured creditors	0.60	180.00	ERS
	Draft & review Memo on interest rates for secured creditors under a Subchapter V Plan	3.40	1,020.00	ERS
	Research re: T-Bill Chart re: historical 1-year interest rate numbers	0.20	60.00	ERS
Jul-12-24	Research case law re: risk adjustment enhancement on interest rates re: payment to secured creditors	2.30	690.00	ERS

	Research re: Third Circuit case law re: interest rate under Plan	1.70	510.00	ERS
	Draft & review Memo on applicable interest rates to secured creditors under a Subchapter V Plan	2.60	780.00	ERS
Jul-15-24	Research re: Subchapter V Dockets / filings in DE Bankruptcy Court	1.00	300.00	ERS
	Research re: UST Objections to Subchapter V Plans	2.30	690.00	ERS
	Research re: Confirmation Orders	2.30	690.00	ERS
	Research re: Subchapter V filing from Western District of Texas Bankruptcy Court	0.30	90.00	ERS
	Review of Objection filed by Trustee from Western District of Texas Bankruptcy Court	0.80	240.00	ERS
Jul-16-24	Research re: Subchapter V Plan Provisions re: rates for secured creditor distributions	1.90	570.00	ERS
	Research: review creditor objections to saved Subchapter V filings	3.00	900.00	ERS
Jul-17-24	Review In Re Intact & Wireless Communications Holding Inc.	1.30	390.00	ERS
	Review of most up to date version of Debtor Chapter 11 Plan of Reorganization	1.00	300.00	ERS
	Research re: plan provisions re: projected disposable income in comparison to debtor plan provisions	1.60	480.00	ERS
Apr-26-24	Review research re: treatment of secured creditors under Subchapter V Plan; subordination issues	1.20	660.00	RMG
Apr-28-24	Review & analyze Subchapter V confirmation provisions; calculation of disposable income	0.20	110.00	RMG
Apr-29-24	Research re: Subchapter V Plan issues; intersection of 1111(b) issues; avoidance action strategy	1.50	825.00	RMG
May-07-24	Review & analyze recent case law re: Subchapter V disposable income; impact on New Way treatment of N. Hackett's claim	0.30	165.00	RMG

May-15-24	Review & analyze Subchapter V Plan Provisions	1.20	660.00	RMG
May-16-24	Review & analyze Chapter 11 Subchapter V Plan Provisions; disposable income issues	1.50	825.00	RMG
May-17-24	Research re: Subchapter V Plan analysis; treatment of N. Hackett claim; Paret Construction	2.90	1,595.00	RMG
	Review & analyze Subchapter V Plan Terms & Conditions	0.80	440.00	RMG
May-23-24	Research re: Subchapter V case law; treatment of under secured creditors; In Re Body Transit case & impact in crafting Chapter 11 Plan & avoidance complaint	3.20	1,760.00	RMG
May-29-24	Review & analyze procedures to approve Solicitation of Subchapter V Plan & Establishing Voting Procedures	0.40	220.00	RMG
May-31-24	Review & analyze Brief In Support of Chapter 11 Plan	0.20	110.00	RMG
Jun-03-24	Review & analyze Memos In Support of Subchapter V Plan Confirmation	0.70	385.00	RMG
	Research re: Memo In Support of Subchapter V Confirmation	1.70	935.00	RMG
Jun-07-24	Draft & review Brief In Support of Confirmation of Subchapter V Plan	1.80	990.00	RMG
Jun-10-24	Draft & review Brief In Support of Subchapter V Plan Confirmation	0.30	165.00	RMG
Jun-11-24	Draft & review Memorandum of Law In Support of Confirmation of Subchapter V Plan	6.00	3,300.00	RMG
Jun-24-24	Review & analyze Subchapter V Plan Terms	0.20	110.00	RMG
Jun-26-24	Research re: 1191 confirmation issues; fair & equitable standard for unsecured creditors	1.00	550.00	RMG
Jun-27-24	Review & analyze ERS Memo re: potential Plan Objections to Subchapter V Plan under 1191 & 1129(b)	0.70	385.00	RMG
Jul-01-24	Review , analyze & revise Motion to Approve Plan Solicitation Procedures & Plan deadlines	0.50	275.00	RMG



Jul-02-24	Review, analyze & revise Motion to Approve Solicitation Procedures & Related Relief	1.10	605.00	RMG
	Review, analyze & revise proposed Order Approving Solicitation Procedures & Exhibits 1, 2-1, 2-2, 2-3, 3 & 4 thereto	5.50	3,025.00	RMG
Jul-03-24	Review & revise Exhibits to Motion to Approve Solicitation Procedures & Hearing Dates	1.30	715.00	RMG
Jul-11-24	Review, analyze & revise Article 2 of Plan	0.40	220.00	RMG
Jul-14-24	Review , analyze & revise Plan	1.30	715.00	RMG
Jul-15-24	Review , analyze & revise Plan	8.30	4,565.00	RMG
	Zoom meeting with G. Harris, M. Reich & AJK re: liquidation analysis & projections for Plan	1.80	990.00	RMG
	Review emails to/from G. Harris re: Plan, Plan Exhibits & calculation of UST Fees for liquidation analysis	0.30	165.00	RMG
	(2nd) Conference call with G. Harris, M. Reich & AJK re; projected disposable income; Financial Exhibits for Plan	0.70	385.00	RMG
Jul-16-24	Review , analyze & revise Plan of Reorganization	1.90	1,045.00	RMG
	Review, analyze & revise Motion to Approve Solicitation Procedures & Related Relief	1.80	990.00	RMG
	Review, analyze & revise Solicitation Procedures Order & Exhibits 1-6 thereto	2.90	1,595.00	RMG
	Review, analyze & revise Plan Exhibits A-J	1.00	550.00	RMG
	Review emails to/from G. Harris re: Plan Exhibits	0.10	55.00	RMG
	Telephone conference with Greg Harris, Mike Reich & AJK re: comments to revised Projections & Exhibits to Plan - Settlement with Hackett	0.70	385.00	RMG
Jul-17-24	Review, analyze & revise Motion to Approve Solicitation Procedures & Related Relief	0.60	330.00	RMG

	Draft & review Plan & Exhibit H; Review of Schedule G	0.50	275.00	RMG
	Review, analyze & revise Solicitation Procedures Order & Exhibit 1-6 thereto	2.00	1,100.00	RMG
	Review, analyze & revise Plan of Reorganization	0.70	385.00	RMG
	Emails to/from J. Schaffstall, D. Devitt & G. Harris re: Plan revisions; Exhibit H to Plan	0.30	165.00	RMG
	Review email from G. Harris re: adjusted A/R Schedule; projected revenues	0.10	55.00	RMG
Jul-18-24	Review, analyze & revise Plan re: revisions to Settlement Agreement	1.60	880.00	RMG
	Review & analyze final version of Plan & Exhibits A-J for filing	0.60	330.00	RMG
Aug-01-24	Review , analyze & revise draft Liquidation Analysis for Subchapter V Plan	0.50	275.00	RMG
Aug-06-24	Review , analyze & revise Projected Disposable Income Schedule / Liquidation Analysis	0.70	385.00	RMG
	Review & analyze Treatment of PNC; timing of Plan payments; possible Objections	0.50	275.00	RMG
Aug-07-24	Review email to K. Cartwright re: Disposable Income Projections; Liquidation Analysis	0.10	55.00	RMG
Aug-12-24	Review email from K. Cartwright re: receipt of financial projections & Liquidation Analysis	0.10	55.00	RMG
Aug-19-24	Review , analyze & revise Solicitation Order & Exhibits thereto	0.40	220.00	RMG
Aug-22-24	Review, analyze & revise Solicitation Package for distribution to creditors	0.60	330.00	RMG
Aug-28-24	Review & analysis of Plan timing issues & PNC Treatment & possible Plan Objections	0.30	165.00	RMG
Aug-30-24	Review & analyze Plan issues; Memo of Law	0.50	275.00	RMG
May-03-24	Conference with AJK re: strategic Plan options	0.90	450.00	RWS

May-13-24	Conference with AJK re: plan options	0.60	300.00	RWS
Jun-13-24	Prepared initial Plan	1.90	950.00	RWS
Jun-14-24	Conference with AJK re: Plan options	0.50	250.00	RWS
	Prepared draft Plan	3.10	1,550.00	RWS
Jun-26-24	Prepared Plan insert for Sale Motion & Lease Motion	0.50	250.00	RWS
Jul-17-24	Review & revise Plan	1.20	600.00	RWS
Jun-19-24	Prepared Inserts for Plan	5.00	825.00	JH
Jun-20-24	Prepared additional inserts to Plan	2.50	412.50	JH
Jun-24-24	Prepared additional insert to Plan	0.50	82.50	JH
	Prepared revisions to Plan	2.50	412.50	JH
Jun-25-24	Continue revisions to Plan	3.00	495.00	JH
Jun-26-24	Prepared insert to Motion to Approve Solicitation Procedures	0.30	49.50	JH
	Prepared revised Solicitation Procedure Order (Ex. 4)	1.00	165.00	JH
	Prepared revised Solicitation Procedures (Ex. 1)	0.50	82.50	JH
	Prepared revised Class 2 Ballot (Ex. 2.1)	0.30	49.50	JH
	Prepared revised Class 3 Ballot (Ex. 2.2)	0.30	49.50	JH
	Prepared revised Class 4 Ballot (Ex. 2.3)	0.30	49.50	JH
	Prepared Notice of Confirmation Hearing (Ex. 3)	0.30	49.50	JH
Jun-27-24	Prepared revised Exhibit 4 to Solicitation Procedures Order re: Non-Voting Status Notice	0.30	49.50	JH
	Prepared revised Exhibit 5 to Solicitation Procedures Order re: Plan Supplement Notice	0.30	49.50	JH
	Prepared revised Exhibit 6 to Solicitation Procedures Order re: cover letter	0.30	49.50	JH

	Prepared insert to Plan re: Summary of Classes	0.30	49.50	JH
	Prepared revised Plan	3.50	577.50	JH
Jun-28-24	Prepared revisions to Plan	1.00	165.00	JH
Jul-11-24	Prepared revisions to Plan	0.40	66.00	JH
Jul-16-24	Prepared revised Table of Contents to Plan	0.50	82.50	JH
Jul-17-24	Prepared final version of Plan	1.50	247.50	JH
Jul-18-24	Prepared Motion to Approve Solicitation Procedures for filing	1.00	165.00	JH
	Prepared revised Table of Contents to Plan & prepared Plan for filing	2.00	330.00	JH
Jul-24-24	Prepared Binder containing Plan documents	0.50	82.50	JH
Aug-02-24	Review of docket & prepare CONR to Motion to Approve Solicitation Procedures	0.30	49.50	JH
Aug-15-24	Prepared revised Solicitation Procedures Order & All Exhibits	2.00	330.00	JH
Aug-19-24	Begin preparation of Solicitation Package Service List	2.00	330.00	JH
Aug-20-24	Continue preparation of Solicitation Service	3.50	577.50	JH
	Prepared for filing proposed Solicitation Procedures Order with compare version	0.50	82.50	JH
Aug-22-24	Prepared Solicitation version of Plan & Exhibits	1.50	247.50	JH
Aug-23-24	Prepared final Solicitation version of Plan for filing	0.70	115.50	JH
	Prepared Notice of Confirmation Hearing for filing	0.20	33.00	JH
	Prepared Solicitation Procedures for filing	0.20	33.00	JH
	Prepared Notice of Non-Voting Status for filing	0.20	33.00	JH

	Prepared COS of Solicitation Package for 2002 Parties	0.20	33.00	JH
	Prepared COS of Solicitation Package	0.40	66.00	JH
	Prepared Flash Drives with Solicitation Package	1.30	214.50	JH
	Prepared Solicitation Service Package	1.00	165.00	JH
Aug-26-24	Prepared Solicitation Packages for mailing	3.00	495.00	JH
	Totals	386.30	\$175,936.50	

**FEE SUMMARY:**

Lawyer	Hours	Effective Rate	Amount
Aris J. Karalis	137.20	\$650.00	\$89,180.00
Eric R. Schachter	129.80	\$300.00	\$38,940.00
Robert M. Greenbaum	65.50	\$550.00	\$36,025.00
Robert W. Seitzer	8.70	\$500.00	\$4,350.00
Jill Hysley	45.10	\$165.00	\$7,441.50

**Balance Due Now \$175,936.50**